



Commonwealth of Virginia
VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

PIEDMONT REGIONAL OFFICE
4949-A Cox Road, Glen Allen, Virginia 23060
(804) 527-5020 FAX (804) 698-4178
www.deq.virginia.gov

Andrew R. Wheeler
Secretary of Natural and Historic Resources

Michael S. Rolband, PE, PWD, PWS Emeritus
Director
(804) 698-4000

James Golden
Regional Director

DRAFT

Mr. Harry Dillman
VP Operations
Service Center Metals
5850 Quality Way
Prince George, VA 23875

Location: Prince George County
Registration No.: 52948

Dear Mr. Dillman:

Attached is a permit to operate an aluminum casting facility in accordance with the provisions of the Virginia State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution.

In the course of evaluating the application and arriving at a final decision to approve the project, the Department of Environmental Quality (DEQ) deemed the application complete on February 1, 2022 and solicited written public comments by placing a newspaper advertisement in the Progress-Index newspaper on February 13, 2022. The required comment period, provided by 9 VAC 5-80-1020A expired on March 15, 2022.

This permit contains legally enforceable conditions. Failure to comply may result in a Notice of Violation and/or civil charges. Please read all permit conditions carefully.

This permit approval to operate shall not relieve Service Center Metals of the responsibility to comply with all other local, state, and federal permit regulations.

The proposed scrap melting lines are subject to 40 CFR 63, Maximum Achievable Control Technology (MACT) Subpart RRR. Virginia has accepted delegation of this rule. In summary, the units are required to comply with certain federal emission standards and operating

limitations. The Department of Environmental Quality (DEQ) advises you to review the referenced MACT to ensure compliance with applicable emission and operational limitations. As the owner/operator you are also responsible for any monitoring, notification, reporting and recordkeeping requirements of the MACT. Notifications shall be sent to both EPA, Region III and Virginia DEQ.

To review any federal rules referenced in the above paragraph or in the attached permit, the US Government Publishing Office maintains the text of these rules at www.ecfr.gov, Title 40, Part 63.

The Board's Regulations as contained in Title 9 of the Virginia Administrative Code 5-170-200 provide that you may request a formal hearing from this case decision by filing a petition with the Board within 30 days after this case decision notice was mailed or delivered to you. Please consult the relevant regulations for additional requirements for such requests.

As provided by Rule 2A:2 of the Supreme Court of Virginia, you have 30 days from the date you actually received this permit or the date on which it was mailed to you, whichever occurred first, within which to initiate an appeal of this decision by filing a Notice of Appeal with:

Director
Department of Environmental Quality
P. O. Box 1105
Richmond, VA 23218

If this permit was delivered to you by mail, three days are added to the thirty-day period in which to file an appeal. Please refer to Part Two A of the Rules of the Supreme Court of Virginia for information on the required content of the Notice of Appeal and for additional requirements governing appeals from decisions of administrative agencies.

If you have any questions concerning this permit, please contact the regional office at (804) 527-5020.

Sincerely,

James E. Kyle, P.E.
Air Permit Manager

JEK/AMS/52948_02_2022 SOP final draft.docx

Attachment: Permit

cc: DEQ Air Compliance Staff



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STATIONARY SOURCE PERMIT TO OPERATE

In compliance with the Federal Clean Air Act and the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution,

Service Center Metals
5850 Quality Way
Prince George, VA 23875
Registration No.: 52948

is authorized to construct and operate

an aluminum casting facility

located at

Chudoba Parkway (3,200 feet east of the intersection of Route 460 and I-295) in Prince George County

in accordance with the Conditions of this permit.

Approved on **DRAFT**.

James E. Kyle, P.E.
Regional Air Permit Manager, Department of Environmental Quality

Permit consists of 6 pages.
Permit Conditions 1 to 14.

INTRODUCTION

This permit approval is based on the permit application dated December 9, 2021, including supplemental information dated February 1, 2022. Any changes in the permit application specifications or any existing facilities that alter the impact of the facility on air quality may require a permit. Failure to obtain such a permit prior to construction may result in enforcement action. In addition, this facility may be subject to additional applicable requirements not listed in this permit.

Words or terms used in this permit shall have meanings as provided in 9 VAC 5-10-10 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution. The regulatory reference or authority for each condition is listed in parentheses () after each condition.

Annual requirements to fulfill legal obligations to maintain current stationary source emissions data will necessitate a prompt response by the permittee to requests by the DEQ or the Board for information to include, as appropriate: process and production data; changes in control equipment; and operating schedules. Such requests for information from the DEQ will either be in writing or by personal contact.

The availability of information submitted to the DEQ or the Board will be governed by applicable provisions of the Freedom of Information Act, §§ 2.2-3700 through 2.2-3714 of the Code of Virginia, § 10.1-1314 (addressing information provided to the Board) of the Code of Virginia, and 9 VAC 5-170-60 of the State Air Pollution Control Board Regulations. Information provided to federal officials is subject to appropriate federal law and regulations governing confidentiality of such information.

Equipment List - Equipment at this facility covered by this permit consists of:

Equipment to be constructed:

Reference No.	Equipment Description	Rated Capacity	Delegated Federal Requirements
MCF1	Single Chamber Melting & Casting Furnace (2022)	50 MMBtu/hr; 29.02 tons/hr	40 CFR 63, Subpart RRR
MCF2	Single Chamber Melting & Casting Furnace (2022)	50 MMBtu/hr; 29.02 tons/hr	40 CFR 63, Subpart RRR
MCF3	Single Chamber Melting & Casting Furnace (2022)	50 MMBtu/hr; 29.02 tons/hr	40 CFR 63, Subpart RRR

Specifications included in the above tables are for informational purposes only and do not form enforceable terms or conditions of the permit.

PROCESS REQUIREMENTS

1. Emission Controls – Hydrogen chloride (HCl) emissions from each of the melting/holder & casting furnaces (MCF1, MCF2, MCF3) shall be controlled by three lime-injected baghouses (BH1, BH2, BH3). The baghouses shall be provided with adequate access for

inspection and shall be in operation when the melting/holder & casting furnaces (MCF1, MCF2, MCF3) are operating.
(9 VAC 5-80-850)

2. Control Device Monitoring - To ensure good performance, the system that injects lime into the baghouses (BH1, BH2, BH3) shall be observed by the permittee with a frequency of not less than once per day of operation. If lime is found not to be free flowing during any of these observations, the owner or operator must increase the frequency of inspections to at least once every 12-hours for the next three days. The owner or operator may return to daily observations if corrective action results in no further blockages of lime during the three-day period. The permittee shall keep a log of the observations from the lime injection system and any corrective actions.
(9 VAC 5-80-850)

OPERATING LIMITATIONS

3. Processing – Reactive Flux Usage - The approved flux for use in the melt production is a non-gaseous chlorine flux. A change in the flux formulation may require a permit to modify and operate.
(9 VAC 5-80-850)
4. Flux Throughput - The total throughput of reactive flux to the melting/holder & casting furnaces (MCF1, MCF2, MCF3) shall not exceed 563 tons per year, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
(9 VAC 5-80-850)

EMISSION LIMITS

5. Process Emission Limits - Emissions from the operation of the melting/holder & casting furnaces (MCF1, MCF2, MCF3), including fugitive emissions, shall not exceed the limits specified below:

Hydrogen Chloride 7.7 tons/yr

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Conditions 1 through 4.
(9 VAC 5-80-850)

RECORDS

6. On Site Records - The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Piedmont Regional Office. These records shall include, but are not limited to:
- a. The monthly and annual throughput of flux (in tons) from the melting/holder & casting furnaces (MCF1, MCF2, MCF3). Annual throughput shall be calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
 - b. Operation and control device monitoring records for the lime-injection system on the baghouses (BH1, BH2, BH3) as required in Condition 2.
 - c. Scheduled and unscheduled maintenance and operator training.

These records shall be available for inspection by the DEQ and shall be current for the most recent five years.

(9 VAC 5-80-900)

GENERAL CONDITIONS

7. Permit Suspension/Revocation - This permit may be suspended or revoked if the permittee:
- a. Knowingly makes material misstatements in the permit application or any amendments to it;
 - b. Fails to comply with the conditions of this permit;
 - c. Fails to comply with any emission standards applicable to a permitted emissions unit;
 - d. Causes emissions from the stationary source which result in violations of, or interfere with the attainment and maintenance of, any ambient air quality standard; or
 - e. Fails to operate in conformance with any applicable control strategy, including any emission standards or emissions limitations, in the State Implementation Plan in effect at the time an application for this permit is submitted.
 - f. Fails to comply with the applicable provisions of Articles 6, 8, and 9 of 9 VAC 5 Chapter 80.

(9 VAC 5-80-1010)

8. Right of Entry - The permittee shall allow authorized local, state, and federal representatives, upon the presentation of credentials:
- a. To enter upon the permittee's premises on which the facility is located or in which any records are required to be kept under the terms and conditions of this permit;
 - b. To have access to and copy at reasonable times any records required to be kept under the terms and conditions of this permit or the State Air Pollution Control Board Regulations;
 - c. To inspect at reasonable times any facility, equipment, or process subject to the terms and conditions of this permit or the State Air Pollution Control Board Regulations; and
 - d. To sample or test at reasonable times.

For purposes of this condition, the time for inspection shall be deemed reasonable during regular business hours or whenever the facility is in operation. Nothing contained herein shall make an inspection time unreasonable during an emergency.
(9 VAC 5-170-130 and 9 VAC 5-80-850)

9. Maintenance/Operating Procedures - At all times, including periods of start-up, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate the affected source, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions.

The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with respect to the lime-injected baghouses:

- a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.
- b. Maintain an inventory of spare parts.
- c. Have available written operating procedures for equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum.
- d. Train operators in the proper operation of all such equipment and familiarize the operators with the written operating procedures, prior to their first operation of such equipment. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.

Records of maintenance and training shall be maintained on site for a period of five years and shall be made available to DEQ personnel upon request.

(9 VAC 5-50-20 E and 9 VAC 5-80-850)

10. Record of Malfunctions - The permittee shall maintain records of the occurrence and duration of any bypass, malfunction, shutdown or failure of the facility or its associated air pollution control equipment that results in excess emissions for more than one hour. Records shall include the date, time, duration, description (emission unit, pollutant affected, cause), corrective action, preventive measures taken and name of person generating the record.
(9 VAC 5-20-180 J and 9 VAC 5-80-850)
11. Notification for Facility or Control Equipment Malfunction - The permittee shall furnish notification to the Piedmont Regional Office of malfunctions of the affected facility or related air pollution control equipment that may cause excess emissions for more than one hour. Such notification shall be made no later than four daytime business hours after the malfunction is discovered. The permittee shall provide a written statement giving all pertinent facts, including the estimated duration of the breakdown, within 14 days of discovery of the malfunction. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the permittee shall notify the Piedmont Regional Office.
(9 VAC 5-20-180 C and 9 VAC 5-80-850)
12. Violation of Ambient Air Quality Standard - The permittee shall, upon request of the DEQ, reduce the level of operation or shut down a facility, as necessary to avoid violating any primary ambient air quality standard and shall not return to normal operation until such time as the ambient air quality standard will not be violated.
(9 VAC 5-20-180 I and 9 VAC 5-80-850)
13. Change of Ownership - In the case of a transfer of ownership of a stationary source, the new owner shall abide by any current minor NSR permit issued to the previous owner. The new owner shall notify the Piedmont Regional Office of the change of ownership within 30 days of the transfer.
(9 VAC 5-80-940)
14. Permit Copy - The permittee shall keep a copy of this permit on the premises of the facility to which it applies.
(9 VAC 5-80-860 D)